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Stuart Mermelstein

April 29, 2020

<u>Via ECF</u> Honorable Alison J. Nathan U.S. District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312

RE: Kadian Noble v. Weinstein, et, al., Case No.17 Civ. 09260 (RWS):

Joint Status Letter Pursuant to Order of December 18, 2019 (ECF 130)

Dear Judge Nathan:

The parties to the above-captioned action, through their undersigned counsel, submit this Joint Status Letter pursuant to the Court's Order dated December 18, 2019.

At the time of the last Status Letter, the parties had recently signed a settlement term sheet. Under this term sheet, the settlement will finally resolve this action brought by Kadian Noble, as well as other claims concerning the acts and conduct of Harvey Weinstein, in a complex agreement that includes numerous other parties in interest. The process of formulating the language for this final settlement agreement has moved more slowly than expected, particularly in light of the covid-19 situation. Nonetheless, a proposed agreement is presently being circulated, the final version of which will be included in the plan of liquidation and global settlement of the Chapter 11 bankruptcy case, *In Re The Weinstein Company Holdings, LLC*, 18-10601 (Bankr. D. Del.) (the "Bankruptcy Case"). As mentioned in prior Status Reports, the final settlement agreement will be subject to approval in the Bankruptcy Case and in *Geiss v. The Weinstein Company Holdings LLC*, et al., case no. 1:17-cv-09554-AKH, U.S. District Court, Southern District of New York (the "Class Action").

The parties remain confident that this settlement will be finalized and resolve the lawsuit.

Based on the foregoing, the parties suggest that another joint status report be due in this case in 120 days. Thank you for your consideration of this matter.

SO ORDERED.

Respectfully submitted,

<u>/s/ Stuart Mermelstein</u>
Stuart Mermelstein
HERMAN LAW
Attorney for Plaintiff

<u>/s/ Phyllis Kupferstein</u>

Phyllis K KUPFER Attorney

SO ORDERED.

ALISON I. NATHAN, U.S.D.I.